March 5th, 2014

Letter – Expression of Interest
VIA ECFS

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

Re: Expression of Interest – Rural Broadband Experiments
Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

This letter is to express the Mid-Ohio Valley Regional Council's interest in participating in the Rural Broadband Experiments announced at the January 30th FCC Open Meeting. While we do not have a specific project to propose at this time, we take this opportunity to document our region's need for high-speed Internet service. We respectfully ask the Federal Communications Commission to consider our area's need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

Background

The Mid-Ohio Valley Regional Council (MOVRC) located in downtown Parkersburg, West Virginia participates in two regional planning programs to serve an eight county area. The MOVRC is a Local Development District (LDD) under the Appalachian Regional Commission (ARC) and an Economic Development District (EDD) under the U.S. Department of Commerce, Economic Development Administration (EDA). The MOVRC provides planning, economic and community development assistance to Calhoun, Jackson, Pleasants, Ritchie, Roane, Tyler, Wirt and Wood Counties. Our region serves some of the most distressed counties in the state, each of which has faced economic hardships in the last decade. Our recent Broadband Assessment has shown that many rural areas still rely on dial-up providers due to a lack of broadband. Please see the attached Broadband Assessment Plan for more details. Our goal is to assist in bringing the internet service in our region to parity with the nation.

Geographic Territory

The Mid-Ohio Valley Region occupies 2,672 square miles within the Appalachian Plateau Province. It is a distinct geologic region having a characteristic surface topography consisting of broad lowlands and river terraces that end abruptly in steep hill slopes and narrow valleys. The elevation ranges from 572 feet above mean sea level at the Ohio River near Parkersburg to 1,300 feet in the eastern part of the region. For years, our geography has been a challenge for utility expansion, particularly with internet service.

Currently we have one provider that serves multiple counties that is extremely interested in bringing broadband access to more of its landline telephone customers. The barriers that Armstrong Telephone faces in bringing broadband to more residents and businesses is cost per mile to run traditional fiber lines into the hills and valleys in West Virginia. These same hills and valleys prohibit wireless distribution without multiple repeaters. Current satellite providers have also found the conditions are less than ideal in providing service due to the changing climatic conditions and shadows created by the topography.

The areas of Calhoun, Ritchie and Roane County are the areas currently least likely to receive improved broadband service. These counties contain some of the more rugged terrain and low population densities within our region. By utilizing a multitude delivery types broadband can be offered but it will take some study to determine the feasibility of each delivery mechanism and how best to cover the costs of such build out.

Proposed technology

A proposal needs to be realistic in order to properly plan, so having a fiber broadband availability for the entire region offering 20up/5down is great but not likely to happen. Each county is unique in what providers are currently in the area with the potential to expand the broadband offerings and what technology works best. Wood County, WV is more populous and industrialized so a county-wide fiber goal is reasonable. Wood County also currently has multiple broadband providers so rates are cheaper compared to the remainder of the region. Wirt County on the other hand is still utilizing dial up services and using landline phones over copper as cell phone towers are few.

Please refer to our Regional Broadband Strategic Plan document for the costs subscribers are paying. Residents are paying anywhere from $10 to $80 for subpar service. We would like to be on par with the rest of the nation. An FCC survey, "Broadband Adoption and Use in America," gave the average price of broadband access as $41/month.
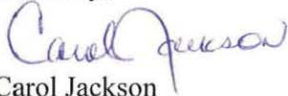
Existing Providers

Please see the attached chart that illustrates the region's ISPs and their availability (cable, DSL, wireless, satellite) in each county as well as the list of providers, available speeds, and pricing information.

Local or Tribal Government Participation

Please see the attached list of our region's municipalities, county commissions and Economic Development Authorities.

Thank you for considering our Expression of Interest in your decisions about the amount of funding that will be allocated in the Rural Broadband Experiments. We commend the FCC in this effort to connect rural communities and are ready to help you close the digital divide.

Sincerely,

Carol Jackson
Executive Director
Mid-Ohio Valley Regional Council

The chart below illustrates the region's ISPs and their availability (cable, DSL, wireless, satellite) in each county. Please refer to the following page to see the list of providers, available speeds, and pricing information.

RESIDENTIAL OFFERINGS

County Name:	Internet Service Providers:										
	Armstrong	CAS	EarthLink	Frontier	HughesNet	StratusWave	SuddenLink	T-Mobile Wireless	Toast.Net Wireless	Verizon	Wild Blue Satellite
Calhoun			✓	✓	✓	✓		✓	✓	✓	✓
Jackson	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Pleasants	✓		✓	✓	✓	✓	✓	✓	✓		✓
Ritchie	✓		✓		✓	✓		✓	✓		✓
Roane			✓	✓	✓	✓	✓	✓	✓		✓
Tyler			✓	✓	✓	✓	✓	✓	✓		✓
Wirt	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓
Wood	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓

BUSINESS OFFERINGS

County Name:	Internet Service Providers:								
	CityNet	CAS	EarthLink	Frontier	HughesNet	Lumos	StratusWave	SuddenLink	Time Warner
Calhoun	✓	✓	✓	✓	✓		Business Internet available but no details listed.	✓	✓
Jackson	✓	✓	✓	✓	✓			✓	✓
Pleasants	✓	✓	✓	✓	✓			✓	✓
Ritchie	✓	✓	✓	✓	✓			✓	✓
Roane	✓	✓	✓	✓	✓			✓	✓
Tyler	✓	✓	✓	✓	✓			✓	✓
Wirt	✓	✓	✓	✓	✓			✓	✓
Wood	✓	✓	✓	✓	✓	✓		✓	✓

Provider:	Speed (Mbps):	Pricing (per month):
Armstrong Utilities – Cable (Down/Up)	5 / .512	$40
CityNet – OCX (Business)	OC3: 155, OC12: 622, OC48: 2450	No costs listed
CityNet - DS3 (Business)	45	No costs listed
CityNet - ISDN Speeds (Business)	.112	No costs listed
CityNet - ISDN (Business)	1 Band / 2 Band	$19.95 / $39.90
Comcast Cable (Home/Business)	Not available in area	Not available in area
CAS Cable	5 / 15 / 30 / 50 / 75	$34.95/44.95/64.95/74.95/89.95
CAS - Business Internet Speed	1000	$79.95 (with phone)
Earthlink - Standard DSL Speed (Business) (Down/Up)	6 / .768	$67
Earthlink - Dedicated ADSL Speed (Down/Up)	7 / .768	$97
Earthlink - Satellite Speed	5	$59.99
Frontier - DSL Speed (Down/Up)	6 / .768	$29.99
Frontier Business Speed	7/15/20/40	$49.99/79.99/109.99/139.99
Hughesnet - Satellite Speed (Down/Up)	5 / 1 – 10 / 1 – 10 / 2 – 15 / 2	$49.99/59.99/79.99/129.99
Hughesnet Business Speed	15	$69.99
Lumos Business	4 / 10 / 15 / 20 / 35 / 50	No pricing available
Ntelos Mobile Wireless Cost (Unlimited Minutes)	Not available	$10
Shentel DSL	Not available in area	Not available in area
Sprint	Not available in area	Not available in area
StratusWave DSL	3 / 5	$19.95/34.95
Suddenlink Cable	15	$35
Suddenlink Business (Down/Up)	6 /.768 – 8 / 1 – 12 / 2 – 20 / 5 – 50 / 8	$74.95/134.95/204.95/299.95/349.95
T-Mobile Wireless Speed (Down/Up)	2 - 5 / 1 - 3	500M: $20, 2G: $30, 4G: $40, 6G: $50, 8G: $60, 10G: $70, 12G: $80
Time Warner Cable Speed	Not available in area	Not available in area
Time Warner Business Speed (Down/Up)	7 - 15 / .768 - 2	Costs not listed
Toast.Net Wireless Mobile Data Plan (GB)	.5/1/3/6	$15/25/40/60
Verizon Residential Speed (Down/Up)	15 / 5 – 50 / 25 – 75 / 35	$49.99/59.99/69.99

Virgin Mobile	Not available in area	Not available in area
WildBlue Satellite Speeds (Down/Up)	12 / 3	10GB: $50, 15GB: $80, 25GB: $130
Windstream	Not available in area	Not available in area
Dial Up ISPs (offered in ALL counties):	**Speed (Mbps):**	**Pricing (per month):**
CityNet		$16.95
EarthLink		$12.50
FrogNet		$14.95
Intergate		$9.95
LocalNet	56 Kbps	$9.95
NetZero		$9.95
StratusWave		$9.95
WVNet		$16.95
Zzzip Dialup		$9.99

**CityNet offers "T1" and "Metro Ethernet" business plans but does not specify speed, cost, or availability on their website.

Where noted as "not available in area", either the provider was listed as an option on the survey form or the answer was written in the "other" option but the provider does not provide service, or the survey respondent was outside the 8-county area (i.e., Athens, Harrison, Lewis counties.)

Sampling of cities and zip codes used for reference:

- Grantsville, 26141
- Ravenswood, 26164
- St. Mary's, 26170
- Harrisville, 26362
- Spencer, 25276
- Paden City, 26159
- Elizabeth, 26143
- Parkersburg, 26104

Provider service sources and references:

http://www.dslreports.com/comments/2626
http://www.citynet.net/page.cfm?mypage=Internet
http://www.cascable.com/coverage.html
http://www.cascable.com/business.html
http://order.frontier.com/Verification.aspx
http://www.ntelos.com/ncontrol
http://www.connectmyhighspeed.com/suddenlink/
https://www.suddenlinkbusiness.com/servicesproducts/Pages/Business%20Internet.aspx

http://www.t-mobile.com/coverage.html

List of Municipalities, County Commissions and Development Authorities in Region V

- Town of Grantsville
- Town of Ravenswood
- City of Ripley
- City of Belmont
- City of St. Marys
- Town of Ellenboro
- Town of Auburn
- Town of Cairo
- Town of Harrisville
- City of Pennsboro
- Town of Pullman
- City of Spencer
- Town of Reedy
- Town of Middlebourne
- Town of Friendly
- City of Sistersville
- City of Paden City
- Town of Elizabeth
- City of Parkersburg
- City of Williamstown
- Town of North Hills
- City of Vienna

- Calhoun County Commission
- Jackson County Commission
- Pleasants County Commission
- Ritchie County Commission
- Roane County Commission
- Tyler County Commission
- Wirt County Commission
- Wood County Commission
- Pleasants County Development Authority
- Jackson County Development Authority
- Wood County Development Authority
- Little Kanawha Area Development Authority
- Roane County Development Authority
- Tyler County Development Authority
- Ritchie County Economic Development Authority